



State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

Department of Environmental Quality

William J. Sinclair
Acting Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

DAQE-IN0133150003-09

March 26, 2009

Kirk Williamson
Whitewater Whirlpool Bath & Systems
195 South Geneva Road
Lindon, Utah 84042

Dear Mr. Williamson:

Re: Intent to Approve: A Reinforced Plastic Composites Plant
Utah County – CDS B, NA; MACT; HAPs and TITLE V Major
Project Code: N013315-0003

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any questions you may have on this project to Mr. Enqiang He. He may be reached at (801) 536-4010.

Sincerely,

Ty L. Howard, Manager
New Source Review Section

TLH:EH:sa

cc: Utah County Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: A Reinforced Plastic
Composites Plant**

**Prepared By: Enqiang He, Engineer
(801) 536-4010
Email: ehe@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0133150003-09

Date: March 26, 2009

Whitewater Whirlpool Bath & Systems

**Source Contact
Gordon Wood
(801) 785-3554**

**Ty L. Howard, Manager
New Source Review Section
Utah Division of Air Quality**

Abstract

Whitewater Whirlpool Baths & Systems (Whitewater) operates a reinforced plastic composites plant in Lindon in Utah County. The company uses styrene based resin to manufacture cultured marble panels, accessories, counter tops, bath tubs and sinks. Utah County is a Non-attainment area of the National Ambient Air Quality Standards (NAAQS) for PM₁₀. Maximum Achievable Control Technology (MACT) regulations Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production applies to this source. Title V of the 1990 Clean Air Act applies to this source. The emissions, in tons per year, will be as follows: PM₁₀ 0.01, NO_x 0.12, SO₂ 0.00, CO 0.10, VOC 30.00, and HAPs 30.00.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in The Daily Herald on March 31, 2009. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed Approval Order conditions during this period and make any comments you may have. The proposed conditions of the Approval Order may be changed as a result of the comments received. Unless changed, the Approval Order will be based upon the following conditions:

General Conditions:

1. This Approval Order applies to the following company:

Site Office

Whitewater Whirlpool Baths & Systems
185 South Geneva Road
Lindon, Utah 84042

Phone Number

Fax Number

Corporate Office Location

Whitewater Whirlpool Baths & Systems
195 South Geneva Road
Lindon, Utah 84042

(801) 785-3554

(801) 785-7962

The equipment listed in this Approval Order shall be operated at the following location:

185 South Geneva Road, Lindon, Utah 84042

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,465.079 km. Northing, 437.264 km. Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this Approval Order (AO) conform to those used in the UAC R307 and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO or in applicable MACT standards, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the following minimum periods:
 - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer
 - B. All other records Five years
6. Whitewater shall operate the reinforced plastic composite plant in Lindon in Utah County in accordance with the terms and conditions of this AO, which was written pursuant to Whitewater's NOI submitted to the Division of Air Quality (DAQ) on April 24, 2006 and additional information submitted to the DAQ on July 18, September 7, November 8; 2006, February 2, March 27; 2007, August 20, November 26; 2008, March 10 and March 16; 2009.
7. The approved installations shall consist of the following equipment:
 - A. One (1) spray booth with filters and two stacks
 - B. Three (3) non-atomized spray guns
 - C. Mixing system with a 21.6 gallon pot mixer
 - D. Cleaning operations
 - E. One natural gas boiler rated at 175,000 Btu/hr (listed for information only)
8. The Spray booth shall be equipped with a set of paint arrestor filters to control particulate emissions (particulate filters or equivalent). The filters shall be maintained and replaced according to the manufacturer's recommendations. All air exiting the booth shall pass through this control system before being vented to the atmosphere (outside building/operation).
9. The VOC containing materials and VOC laden rags shall be stored in covered containers (except when in use).

Limitations

10. Visible emissions from the following emission points shall not exceed the following values:

- A. The spray booth - 10% opacity
- B. All other points - no visible emissions

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

Federal Limitations and Requirements

11. In addition to the requirements of this AO, all applicable provisions of 40 CFR 63, National Emission Standards for Hazardous Air Pollutants for Source Categories Subparts A and WWW, 40 CFR 63.5780 to 63.5935 (National Emission Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production) apply to this installation.

Hazardous Air Pollutants (HAPs) Limitations

12. The plant-wide emissions of HAPs from the reinforced plastic composites production and associated operations shall not exceed:

29.52 tons per rolling 12-month period for Styrene

0.48 tons per rolling 12-month period for Methyl Methacrylate

Compliance with each of the limitations shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

The HAP emissions shall be determined by maintaining a record of HAP emitting materials used each month. The record shall include the parameters used to calculate emissions and emission factors in the tables in Subpart WWW, National Emission Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Records & Miscellaneous

13. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.

14. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
15. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the DAQ. The UAC R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include all processes that generate emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. Except for HAPs, they are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for Whitewater are currently calculated at the following values:

<u>Pollutant</u>	<u>Tons/yr</u>
A. PM ₁₀	0.01
B. SO ₂	0.00
C. NO _x	0.12
D. CO.....	0.10
E. VOC.....	30.00
F. HAPs	
Styrene.....	29.52
Methyl Methacrylate.....	0.48
Total HAPs.....	30.00